

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:19-CV-767-ECM
)	
HYUNDAI MOTOR)	
MANUFACTURING, ALABAMA,)	
LLC; HYUNDAI ENG AMERICA,)	
INC.; and DYNAMIC SECURITY,)	
INC.)	
)	
Defendants.)	

EXHIBIT “C” TO

PLAINTIFF’S OBJECTIONS TO HYUNDAI ENG AMERICA’S

DEPOSITION DESIGNATIONS

RAY CURETON

Case	Key, Davita
Issue Code	HEA Designation

CURETON, RAY 8/30/22 VOL 1			
1	017:15 - 017:15	017:15	MR. MILLER: Same objection.
2	019:07 - 019:11	019:07	A. With Gloria, and I don't remember 08 Gloria's last name, but she was the manager at 09 Hyundai for Dynamic Security that we hired or she 10 actually -- yeah, the one that we hired. 11 Actually, I hired her, so in connection -- in
3	022:22 - 022:22	022:22	MR. MILLER: Object to the form.
4	030:10 - 030:10	030:10	MR. MILLER: Object to the form.
5	031:06 - 031:06	031:06	MR. MILLER: Object to the form.
6	031:15 - 032:01	031:15	Q. And would Ms. Key have been making 16 thirteen dollars an hour the minute she started 17 at the mailroom? 18 A. No. 19 MR. MILLER: Object to the form. 20 A. She would not. My understanding is 21 that they get training pay the first week until 22 they're up to training status and approved. Then 23 they would receive the full thirteen dollars at 032:01 that time.
7	038:13 - 038:13	038:13	MR. MILLER: Object to the form.
8	045:22 - 045:22	045:22	MR. MILLER: Object to the form.
9	046:05 - 046:15	046:05	At minimum, they would have had the 06 uniform that we provided for them, uniforms that 07 we provided for them. And then they -- seems 08 like they included a long-sleeved shirt and maybe 09 a -- it could have been the receptionist. 10 I'm not a hundred percent sure, but 11 it -- you know, they would have been subject to 12 at least as a minimum the security uniform that 13 we provided, and I think that mailroom may have 14 had a little more, but I'm not a hundred percent 15 sure about that.
10	058:22 - 058:22	058:22	MR. MILLER: Object to the form.
11	062:11 - 062:11	062:11	MR. MILLER: Object to the form.

12	062:18 - 062:18	062:18	MR. MILLER: Object to the form.
13	069:21 - 069:21	069:21	MR. MILLER: Object to the form.
14	072:11 - 072:11	072:11	MR. MILLER: Object to the form.
15	072:17 - 072:17	072:17	MR. MILLER: Object to the form.
16	073:06 - 073:06	073:06	MR. MILLER: Object to the form.
17	075:10 - 075:10	075:10	MR. MILLER: Object to the form.
18	075:18 - 075:18	075:18	MR. MILLER: Object to the form.
19	076:05 - 076:05	076:05	MR. MILLER: Object to form.
20	078:05 - 078:05	078:05	MR. MILLER: Object to the form.
21	080:01 - 080:01	080:01	MR. MILLER: Object to the form.
22	080:15 - 080:15	080:15	MR. MILLER: Objection to form.
23	085:01 - 085:01	085:01	MR. MILLER: Object to the form.
24	090:11 - 090:11	090:11	MR. MILLER: Object to the form.
25	090:22 - 090:22	090:22	MR. MILLER: Object to form.
26	091:20 - 091:20	091:20	MR. MILLER: Object to the form.
27	104:11 - 104:11	104:11	MR. MILLER: Object to the form.
28	107:03 - 107:09	107:03	Q. Why would Ms. Key have been 04 terminated? 05 A. Well, if there were other breaking of 06 policies -- all right. To be very careful how I 07 say this, she can request that she be terminated. 08 Gloria had the right to request either 09 termination or reassignment.
29	123:19 - 123:19	123:19	MR. MILLER: Object to the form.
30	129:14 - 130:02	129:14	EXAMINATION 15 BY MS. BROWN: 16 Q. Mr. Cureton -- 17 A. Hi. 18 Q. -- I'm Whitney Brown. I introduced 19 myself at the beginning, and then we also met 20 very briefly before you got started. You've been 21 talking for a while, so it would be an excuse for 22 not remembering. I am counsel for Hyundai 23 Manufacturing Alabama, which we abbreviated as 130:01 HMMA. 02 A. Yes, ma'am.
31	144:15 - 144:20	144:15	Q. And you would agree with me that Ms. 16 Williams was HEA's employee in July and August

		<p>17 2017?</p> <p>18 MS. PALMER: Object to the form.</p> <p>19 A. Obviously. That's, yeah, what we've</p> <p>20 just been determining.</p>
32	150:21 - 151:09	<p>150:21 Q. Regarding the hair standard,</p> <p>22 regardless of who authored it, the specific</p> <p>23 prohibitions against dreads or locks, did you</p> <p>151:01 ever know that to be enforced against only one</p> <p>02 racial group and not another?</p> <p>03 A. It was enforced across the board</p> <p>04 regardless of race.</p> <p>05 Q. To your knowledge, were any white</p> <p>06 Dynamic employees wearing dreadlocks ever</p> <p>07 assigned to HMMA's site?</p> <p>08 A. They were not. Not while I was</p> <p>09 there.</p>
33	151:14 - 153:03	<p>151:14 EXAMINATION</p> <p>15 BY MR. MILLER:</p> <p>16 Q. Mr. Cureton, my name is Matt Miller.</p> <p>17 A. Yes, sir.</p> <p>18 Q. I'm an attorney for HEA, Hyundai</p> <p>19 Engineering America. I just want to ask you just</p> <p>20 a few questions.</p> <p>21 A. Yes, sir.</p> <p>22 Q. As you referenced in a statement that</p> <p>23 we looked at, your statement that we looked at</p> <p>152:01 earlier, it was Exhibit 33, I believe, Ms. Key</p> <p>02 was an employee of Dynamic Security, correct?</p> <p>03 A. That is correct.</p> <p>04 Q. All right. And Ms. Cassandra</p> <p>05 Williams, who we've talked about some today, she</p> <p>06 was not an employee of Dynamic Security, was she?</p> <p>07 A. She is not.</p> <p>08 Q. And what is Ms. Williams' race?</p> <p>09 A. She's African American.</p> <p>10 Q. After Dynamic Security employees</p> <p>11 Gloria Robinson and Lieutenant Chambliss</p> <p>12 interviewed Ms. Key for a position, I believe the</p> <p>13 testimony was that Ms. Robinson then asked for</p> <p>14 Ms. Williams to look at Ms. Key's hairstyle and</p> <p>15 opine whether it met the hairstyle and appearance</p> <p>16 standards for the location. Is that correct?</p>

		<p>17 A. That's correct.</p> <p>18 Q. All right. Your testimony is not</p> <p>19 that Ms. Williams made the hiring decisions for</p> <p>20 Dynamic, is it?</p> <p>21 A. It is not.</p> <p>22 Q. She would -- your testimony, as I</p> <p>23 understand it, was that Ms. Williams would opine</p> <p>153:01 whether a Dynamic employee or applicant would</p> <p>02 meet the appearance standards for the location?</p> <p>03 A. That's correct.</p>
34	153:16 - 153:16	153:16 MR. MILLER: Object to the form.
35	158:17 - 158:17	158:17 MR. MILLER: Object to the form.
36	159:09 - 159:09	159:09 MR. MILLER: Object to the form.
37	159:13 - 159:13	159:13 MR. MILLER: Object to the form.